

EXHIBIT 3

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a)	Case No. 16-cv-1054 (WMW/DTS)
Delaware corporation,)	
)	
Plaintiff,)	
)	
v.)	Jury Trial Demanded
)	
FEDERAL INSURANCE COMPANY,)	
an Indiana corporation, and ACE)	
AMERICAN INSURANCE)	
COMPANY, a Pennsylvania)	
corporation,)	
)	
Defendants.)	

EXPERT REPORT OF R. BICKLEY (BICK) WHITENER

April 19, 2019

CONFIDENTIAL—ATTORNEYS' EYES ONLY

January 2016, Chubb Canada distributed Evolution's code to Australia.⁶⁴ Australia implemented Blaze Advisor as part of its Evolution program.⁶⁵

42. Evolution uses Blaze Advisor to provide underwriting guidance.⁶⁶ Evolution, using Blaze Advisor, contributes to revenue by increasing the speed of response to a request for a quote and the speed of making renewal offers. In addition, it helps the underwriting process achieve a precise, adequate price, increasing the probability the quote will be accepted. This results in an increased quote conversion rate. The application also helps with ease of use for agents and brokers through better data capture and use of third-party data sources. This, in turn, reduces the need to ask the applicant for more data and improves the cost of doing business and the accuracy of data used in the underwriting process, which, in turn, results in a more precise, adequate premium calculation.

43. The use of Blaze Advisor within Evolution improves availability of underwriting associates to agents by reducing the amount of time an underwriting associate needs to spend in the quote, bind, book, issue process. A reduction in time required for the quote, bind, book, issue process allows Chubb to redeploy this underwriting time to other higher-value activities such as marketing and selling Chubb as a premier international insurance company. The reduction in time opens the opportunity for the underwriting associates to handle other, more profitable, transactional work.

(3) EZER

44. EZER (European Zone Executive Risk⁶⁷) is an underwriting workstation and policy administration system that supports the complete end-to-end policy life cycle for all Chubb Commercial Insurance and Chubb Specialty Insurance business in Chubb's European Zone.⁶⁸ EZER supports Chubb's property and casualty business and financial lines business in 13 European countries.⁶⁹ EZER supports the following underwriting processes: quotation, binding, renewal, endorsement, cancellation, reinstatement document generation (sending documents and reports to brokers over email), and Reporting.⁷⁰

45. EZER uses Blaze Advisor to enable renewal policy categorization (i.e. whether a policy meets requirements for automated renewal).⁷¹ EZER, using Blaze

⁶⁴ FED001289; FED009894;

⁶⁵ Depo. Ex. 158 (FED010034); Depo. Ex. 154 (FED014158); Deposition of Henry Mirolyuz, January 11, 2019 20:8-15.

⁶⁶ FED017914_0001.

⁶⁷ FED016469_0004.

⁶⁸ FED004571; Deposition of Henry Mirolyuz, January 11, 2019 66:19-20.

⁶⁹ FED016469_0005.

⁷⁰ *Id.*

⁷¹ FED017914_0001.

Advisor, contributes to revenue by increasing the speed of making renewal offers. In addition, it helps the underwriting process achieve a precise, adequate price, increasing the probability the renewal offer will be accepted.

46. The use of Blaze Advisor within EZER improves availability of underwriting associates to agents by reducing the amount of time an underwriting associate needs to spend in the quote, bind, book, issue process. A reduction in time required for the quote, bind, book, issue process allows Chubb to redeploy this underwriting time to other higher-value activities such as marketing and selling Chubb as a premier international insurance company. The reduction in time opens the opportunity for the underwriting associates to handle other, more profitable, transactional work.

(4) ADAPT

47. ADAPT is a browser-based policy administration system with external broker-facing capabilities.⁷² ADAPT allows for real-time binding and issuance of policies with back-end administration, automation, document generation, and electronic filing.⁷³ ADAPT also enables a broker to view and manage his or her own portfolio.⁷⁴ ADAPT, using Blaze Advisor, contributes to speed of response and ease of doing business through these external broker-facing capabilities. This speed of response and ease of doing business in turn positively influence the opportunity to increase quote volume, which leads to more accepted quotes and more gross written premium.

48. ADAPT is utilized in the United Kingdom, Australia, and other European and Asia Pacific countries.⁷⁵ ADAPT is used for the Chubb Accident and Health line of business.

49. ADAPT uses Blaze Advisor to provide underwriting guidance.⁷⁶ ADAPT, using Blaze Advisor, contributes to revenue by increasing the speed of response to a request for a quote. In addition, it helps the underwriting process achieve a precise, adequate price, increasing the probability the quote will be accepted. This results in an increased quote conversion rate. The application also helps with ease of use for agents and brokers through better data capture and use of third-party data sources. This, in turn, reduces the need to ask the applicant for more data and improves the cost of doing business and the accuracy of data used in the underwriting process, which, in turn, results in a more precise, adequate premium calculation.

⁷² FED004571; Deposition of Henry Mirolyuz, January 11, 2019 68:8-22.

⁷³ FED014390_0006.

⁷⁴ *Id.*

⁷⁵ FED014390_0010 (including France, Italy, Germany, Singapore, and Hong Kong); FED013734_0006 (including France, the Netherlands, Germany, and Italy); FED017438_0004 (including Hong Kong).

⁷⁶ FED017914_0001.